UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

PNC BANK, N.A. COLUMBIA	§
HOUSING SLP CORPORATION, and	§
2013 TRAVIS OAK CREEK, LP	§
,	§
Plaintiffs,	§
,	§
v.	\$ \$ \$ \$ \$ \$ \$ \$
	§
2013 TRAVIS OAK CREEK GP, LLC,	§
2013 TRAVIS OAK CREEK	Š
DEVELOPER, INC.,	§
CHULA INVESTMENTS, LTD.,	§
and RENE O. CAMPOS	Š
	\$ \$ \$
Defendants.	§
Defendants.	§ Civil Action No. 1:17-cv-584-RP-ML
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2013 TRAVIS OAK CREEK GP, LLC	Civil Action No. 1:17-cv-584-RP-ML
	Civil Action No. 1:17-cv-584-RP-ML
2013 TRAVIS OAK CREEK GP, LLC and 2013 TRAVIS OAK CREEK, LP,	Civil Action No. 1:17-cv-584-RP-ML
2013 TRAVIS OAK CREEK GP, LLC	Civil Action No. 1:17-cv-584-RP-ML
2013 TRAVIS OAK CREEK GP, LLC and 2013 TRAVIS OAK CREEK, LP, Plaintiffs,	Civil Action No. 1:17-cv-584-RP-ML
2013 TRAVIS OAK CREEK GP, LLC and 2013 TRAVIS OAK CREEK, LP,	Civil Action No. 1:17-cv-584-RP-ML
2013 TRAVIS OAK CREEK GP, LLC and 2013 TRAVIS OAK CREEK, LP, Plaintiffs, v.	Civil Action No. 1:17-cv-584-RP-ML
2013 TRAVIS OAK CREEK GP, LLC and 2013 TRAVIS OAK CREEK, LP, Plaintiffs, v. PNC BANK, N.A. and COLUMBIA	Civil Action No. 1:17-cv-584-RP-ML
2013 TRAVIS OAK CREEK GP, LLC and 2013 TRAVIS OAK CREEK, LP, Plaintiffs, v.	Civil Action No. 1:17-cv-584-RP-ML

AGREED MOTION FOR EXTENSION OF TIME TO FILE A RESPONSE TO MOTION TO DISMISS

2013 Travis Oak Creek GP, LLC, 2013 Travis Oak Creek Developer, Inc., Chula Investments, Ltd., and Rene O. Campos (collectively "Movants") file this Agreed Motion for Extension of Time to File a Response to the Motion to Dismiss [Dkt. No. 39] filed by PNC Bank, National Association's and Columbia Housing SLP Corporation.

In their Motion, PNC Bank, N.A. and Columbia Housing SLP Corporation request

dismissal under FRCP 12(b)(1) and 12(b)(6) of Movants' claim under Texas state law for the

appointment of a receiver to manage the Partnership and for injunctive relief. The deadline for

Movants to respond to the Motion is July 14, 2017. However, the issue of which party or parties

may have standing to bring a claim on behalf of the Partnership, temporarily or otherwise, is

central to the hearing scheduled for July 21, 2017. In order to minimize the number and volume

of pleadings related to that core issue, and to alleviate any burden that would be placed on the

Court, Movants request the Court to grant an extension of time for Movants to file their response

to the Motion to Dismiss and PNC Bank, N.A. and Columbia Housing SLP Corporation agree to

Movants' request for the extension of time to respond.

WHEREFORE, Movants pray that the Court grant their Agreed Motion for Extension of

Time to Respond to Motion to Dismiss, along with all such other and further relief to which

Movants are justly entitled.

Respectfully submitted,

/s/ Kenneth B. Chaiken

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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF CONFERENCE

I hereby certify that I have conferred with Robert Hoffman, counsel for PNC Bank, National Association and Columbia Housing SLP Corporation, and Mr. Hoffman indicated that he agrees to the relief requested in this Motion.

/s/ Kenneth B. Chaiken
Kenneth B. Chaiken

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served on all counsel of record via the Court's electronic filing system on this 14th day of July, 2017.

/s/ Kenneth B. Chaiken
Kenneth B. Chaiken